

## Attachment 2



January 21, 2009

Ryan Graham  
SANBAG  
1170 W. 3<sup>rd</sup> Street, 2<sup>nd</sup> Floor  
San Bernardino, CA 92410-1715

RE: Measure I 2010-2040 Strategic Plan

Mr. Graham:

Thank you for providing the City of Fontana the opportunity to comment on the Measure I 2010-2040 Strategic Plan. The following comments reflect both City staff and City Manager review:

Page IV-9 Project Funding Agreement.

This section states the following:

"The Development Mitigation Cooperative Agreement provides guarantees by the lead agency prior to any expenditure of Measure I funds on a project that the requisite amount of development mitigation is available from all contributing agencies as outlined in the Nexus Study. Each City Council/Board of Supervisors representing a contributing agency will be required to participate in the Development Mitigation Cooperative Agreement prior to the approval of the Project Funding Agreement."

**City's Comment:**

**Because interchange project priorities are different for each jurisdiction, language should be included in this section to address the scenario whereby a minority share agency is unwilling to be a party to the Funding Agreement or has agreed but is unable to contribute to the project at the time funds are needed. In the event a minority share jurisdiction is unable to contribute to an interchange project, the strategic plan should include funding options so the majority share jurisdiction can continue to move the project forward.**

Page IV-11 Project Advancement Agreement Program Scope

This section states the following:

“At the same time, the SANBAG Board amended the PA provisions to extend the period in which jurisdictions could execute Project Advancement Agreements for Nexus Study projects to January 31, 2009, to clarify that reimbursement will occur in order of expenditure, and to establish April 5, 2006 as the earliest date of expenditures eligible for reimbursement.”

**City's Comment:**

**It is the City's opinion that a project on the Nexus list is a “complete” project from inception to completion. The intent of the PAA's was to simply advance projects. The April 5, 2006, date should be re-evaluated or simply removed completely. At a minimum, interchanges should be considered exempt from April 5, 2006, date for eligible reimbursement.**

This section also states:

“PAA repayment disbursements will occur quarterly in order of the date of expenditure as documented by consultant and contractor invoices reflecting actual project expenditures.”

**City's Comment:**

**The Draft Plan only provides guidelines for the quarterly reimbursement of PAA's based on the date of expenditure. There should be provisions added to the plan giving the Board options to bond or provide credit to jurisdictions for projects later in the Measure should there be an opportunity to do so.**

This sections also states:

Agencies will be reimbursed the public share of the project cost included in the Nexus Study or the public share of the actual project cost, whichever is less.

**City's Comment:**

**Although it is not stated in the draft, it has been discussed that reimbursement of PAA's will be based on the 2006 Nexus Study project costs. It may be more appropriate to address this comment as an agreement issue and not a Strategic Plan**

issue. Either way it does warrant additional discussion as it will place a heavy burden on those jurisdictions that currently have agreements. The attached spread sheet compares the City's 10 original PAA costs and public share (based on the 2006 Nexus Study) to the current project costs. In total, the City's local development impact fee share increases approximately \$32,000,000.

This issue appears to be addressed in Section 4.2.2.2 Advanced Expenditure Process on page 4-11 which states, "As the sponsoring agency begins each subsequent phase of a project, the agreement will be amended to update the project scope, development mitigation commitments and the public share of the cost to be reimbursed by SANBAG.". Adding similar language to the existing PAA's or the Strategic plan should be taken into consideration.

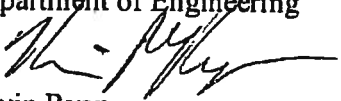
Page IV-20, Table IV-1. Delay Analysis

This table indicates a ranking of 9 for the section of I-10 from Sierra to the I-215. As discussed at November's Plans and Programs Committee meeting, existing and forecast congestion levels should be revisited every two years. As development continues in the area and improvements to Cherry and Citrus Interchanges occur, it is anticipated that congestion will increase on the I-10 main-line from the LA County line to I-215. It is recommended that language be added to the Strategic Plan requiring Tables IV-1 and IV-3 to be update every two years.

Thank you for allowing the City of Fontana to participating in this process. Should you have any questions or need clarification feel free to contact me at 909-350-6655.

Respectfully,

DEVELOPMENT SERVICES ORGANIZATION  
Department of Engineering



Kevin Ryan  
Principal Planner, Transportation

cc: Ken Hunt, City Manager  
Debbie Brazill, Deputy City Manager  
Ricardo Sandoval, City Engineer

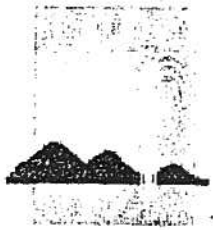
# SANBAG EXISTING AGREEMENTS

| Interchanges and Overpasses | Original Project Cost | Measure I Share |
|-----------------------------|-----------------------|-----------------|
| Duncan/I-15                 | \$18,000,000          | \$4,086,000     |
| Cypress/I-10                | \$20,000,000          | \$10,245,502    |

| Current Project Costs | Revised Measure I Share | Measure I Savings |
|-----------------------|-------------------------|-------------------|
| \$ 44,671,906         | \$10,140,523            | \$ 6,054,523      |
| \$ 32,233,178         | \$21,918,561            | \$ 11,673,059     |

| Arterials      | Original Project Cost | Measure I Share     |
|----------------|-----------------------|---------------------|
| South Highland | \$4,000,000           | \$2,720,000         |
| Walnut         | \$4,200,000           | \$2,856,000         |
| Citrus         | \$4,000,000           | \$2,720,000         |
| Jurupa         | \$12,000,000          | \$8,160,000         |
| Sierra         | \$7,800,000           | \$5,304,000         |
| Foothill       | \$7,400,000           | \$5,032,000         |
| Cherry         | \$3,110,000           | \$2,114,800         |
| Baseline       | \$7,550,000           | \$5,134,000         |
|                | <b>\$88,060,000</b>   | <b>\$48,372,302</b> |

| Current Project Costs | Revised Measure I Share | Measure I Savings    |
|-----------------------|-------------------------|----------------------|
| \$ 5,250,000          | \$3,570,000             | \$850,000            |
| \$ 4,742,000          | \$3,224,560             | \$368,560            |
| \$ 5,680,000          | \$3,862,400             | \$1,142,400          |
| \$ 24,463,000         | \$16,634,840            | \$8,474,840          |
| \$ 4,615,000          | \$3,138,200             | -\$2,165,800         |
| \$ 13,347,000         | \$9,075,960             | \$4,043,960          |
| \$ 4,445,000          | \$3,022,600             | \$907,800            |
| \$ 9,181,000          | \$6,243,080             | \$1,109,080          |
| <b>\$ 148,628,084</b> | <b>\$ 80,830,724</b>    | <b>\$ 32,458,422</b> |



# City of Fontana

## CALIFORNIA

January 15, 2009

Ty Schuiling  
SANBAG  
1170 W. 3<sup>rd</sup> Street, 2<sup>nd</sup> Floor  
San Bernardino, CA 92410-1715

RE: Draft Strategic Plan Discussion with the City of Fontana

Mr. Schuiling:

Thank you for meeting with the City of Fontana to discuss our concerns regarding the Draft Strategic Plan for Measure I 2010-2040. This letter serves to outline our discussion which took place at SANBAG on January 12, 2009.

Project Funding Agreements-Page IV-8:

As discussed in the meeting, SANBAG staff agreed to consider adding language outlining additional guidelines regarding the local fair share contribution to an interchange project by a minority share jurisdiction. Language from Appendix "J" of the Congestion Management Program (CMP) could be included in the Strategic plan or referenced, at a minimum, to establish or re-establish a concrete set of guidelines which minority share agencies would be required to adhere to. In the event a minority share jurisdiction fails to abide by these guidelines, additional language should be added to include viable funding options so the majority share jurisdiction can continue moving the project forward.

Other alternatives discussed included an option requiring jurisdictions to submit interchange development mitigation fees directly to SANBAG for oversight, or redistributing interchange project costs in an equitable manner to eliminate minority share jurisdictions' altogether.

Project Advancement Agreements (PAA) and Advanced Expenditure Agreements (AEA):

Although the language is specific in the strategic plan regarding PAA's and AEA's, the policies for transitioning an existing PAA to an AEA are somewhat vague. As discussed for clarification during the meeting, projects with an existing PAA which do not meet the construction start deadline will be transitioned to an AEA without forfeiting project expenditures incurred from the date of execution of the original PAA.

PAA and AEA repayment disbursements

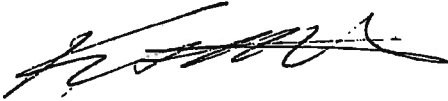
It was suggested by the City that SANBAG evaluate the possibility of applying PAA reimbursement as a credit toward both the City's minority local share contribution for interchange projects as well as local share development impact fee credit for future projects. This could effectively shorten the time frame for PAA reimbursement to the remaining jurisdictions and advance more projects in the early years of the measure.

Interchange Prioritization List:

Also discussed was funding availability for "shelf-ready" interchange projects that are listed near the bottom of the Interchange Priority Funding List. The suggestion was to add language in the Strategic plan which would identify options for early allocation of funds through bonding or loan programs in the event that multiple projects are ready for construction in the early years of the Measure.

Thank you again for meeting with the City of Fontana to discuss these issues. Formal comments regarding the Draft Strategic Plan will be sent to your office prior to the January 21, 2009 deadline. Should you have any questions or need clarification, feel free to contact Kevin Ryan, Principal Planner, Transportation, at (909) 350-6655.

Respectfully,



Kenneth R. Hunt  
City Manager

cc: Debbie Brazill, Deputy City Manager  
Ricardo Sandoval, City Engineer  
Kevin Ryan, Principal Planner, Transportation



THE CITY OF RANCHO CUCAMONGA

RANCHO  
CUCAMONGA

*Mayor*  
DONALD J. KURTH, M.D.

*Mayor Pro Tem*  
DIANE WILLIAMS

*Councilmembers*  
REX GUTIERREZ  
L. DENNIS MICHAEL  
SAM SPAGNOLO

*City Manager*  
JACK LAM, AICP

January 21, 2009

Mr. Steve Smith  
San Bernardino Associated Governments  
1170 W. 3<sup>rd</sup> Street, 2<sup>nd</sup> Floor  
San Bernardino, CA. 92410-1715

**SUBJECT: MEASURE I 2010-2040 STRATEGIC PLAN**

Dear Mr. Smith,

Thank you for taking the time to meet with City staff on January 13, 2009 to discuss our concerns about the Measure I 2010-2040 Strategic Plan. At the meeting, you answered many of our questions, however, we still have 3 concerns. Our 3 concerns are as follows:

1. *Policy PA-9: Expenditures incurred prior to April 5, 2006 (the date the model agreement for the Project Advancement process was adopted by the SANBAG Board of Directors) shall not be reimbursed.*

This provision unfairly and punitively penalizes the City of Rancho Cucamonga by disallowing reimbursement for expenses paid on the Haven Avenue Widening Project, from Base Line Road to 19<sup>th</sup> Street. This project cost approximately \$7,000,000 for construction. The construction contract was awarded by the City Council on April 20, 2005, and was completed in November of 2006. The Measure I 2010-2040 Ordinance was approved by San Bernardino County voters on November 2, 2004. The City of Rancho Cucamonga adopted a Development Impact Fee (DIF) program on May 18, 2005, as required by the Measure I 2010-2040 Ordinance, and obtained a finding from SANBAG on July 8, 2005, that our DIF program was in conformance with this ordinance. The City of Rancho Cucamonga collected fees and built projects all in conformance with Measure I 2010-2040 Ordinance requirements.

The selection of a cut-off date for the reimbursement eligibility of projects "after" the City of Rancho Cucamonga had already started building Nexus Study projects is unfair. The City of Rancho Cucamonga constructed projects with the understanding that re-imbursement would occur sometime in the future after the rules were developed as a part of the Strategic Plan. If we had been told that reimbursement would not be paid prior to April 5, 2006, then we could have delayed the construction of this and other projects. Policy PA-9 should be amended to read as follows, "Expenditures incurred prior to the local agency receiving approval of their local Development Impact Fee Program by the SANBAG Board shall not be reimbursed." The City of Rancho Cucamonga is being singled out for punishment because we were diligent, and were the first agency to receive approval of our Development Impact Fee Program by SANBAG.



Important Dates:

February 17, 2005: City of Rancho Cucamonga provides SANBAG with a list of local arterial street projects for Appendix K of the SANBAG Congestion Management Program.

May 18, 2005: City of Rancho Cucamonga City Council adopts a resolution to amend the City's Development Impact Fee Ordinance per Measure I 2010-2040 Ordinance requirements.

June 9, 2005: City of Rancho Cucamonga sends a letter to SANBAG requesting a conformity finding of our Development Impact Fee Program.

July 8, 2005: Norm King, Executive Director of SANBAG, sends a letter to the City of Rancho Cucamonga stating that our Development Impact Fee program is in conformance with Measure I 2010-2040 Ordinance requirements.

2. SANBAG needs to develop a methodology to provide funding for jointly owned freeway interchange projects. It is not fair that the lead agency bear all of the project costs of the minor partner agencies if the minor partners do not have the funds available to participate in the project cost. SANBAG should provide loans to cover the cost of minor partners, and collect repayment for loans to minor partners from future Measure I 2010-2040 funds.
3. SANBAG needs to consider the ability of the local agency to provide their share of project cost when prioritizing freeway interchanges. A local agency that can show that they have the local share of funding available to build a freeway interchange project should be given top priority.

If you have any additional questions, you are welcome to call me at (909) 477-2740, extension 4051.

Sincerely,

Engineering Services Department

Jon Gillespie  
Traffic Engineer

C: Mayor and Members of the City Council  
Jack Lam, AICP, City Manager  
Pam Easter, Assistant City Manager  
Mahdi Aluzri, Deputy City Manager, Community Development  
Mark Steuer, Director Engineering Services/City Engineer

CITY OF  
**VICTORVILLE**



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14343 Civic Drive  
P.O. Box 5001  
Victorville, California 92393-5001

January 21, 2009

Ty Schuiling, Director of Planning and Programming  
San Bernardino Associated Governments  
1170 W. 3<sup>rd</sup> Street, 2<sup>nd</sup> Floor  
San Bernardino, CA 92410-1715

Reference: Draft Measure I 2010-2040 Strategic Plan

Dear Mr. Schuiling:

Thank you for the opportunity to comment on the draft Measure I 2010-2040 Strategic Plan. This is the second comment letter Victorville is submitting. The first comment letter was submitted on December 1, 2008, based on the draft Strategic Plan that was distributed on November 19, 2008. Comments that were not addressed in the first letter are included in this letter marked with an asterisk. The comments in this letter have taken into account the discussion in the meeting on January 14, 2009 with SANBAG and local agency staff.

\*Language should be added to explain that contributions from new development may include redevelopment agency funds or other funds generated by new development or redevelopment (with more intensive uses) as determined by the local agency. There is a nexus between traffic impacts to roads and redevelopment agency funds. For vacant land, new development has a clear nexus to traffic impacts. Redevelopment agency funds should be an eligible funding source towards the development fair share. This issue was raised in the January 20, 2009 Mountain / Desert Committee meeting and should be addressed in the Strategic Plan. If it is SANBAG staff's opinion that redevelopment agency funds should not be eligible to pay for the development fair share, the opinion should be in writing. The local agencies should have enough time to respond to this opinion for Board consideration prior to the scheduled approval of the Strategic Plan on April 1, 2009.

**Victor Valley Local Streets Program**

**Policy VVLS -2**

This policy gives SANBAG more control than is in the Measure I Ordinance or current Measure I policies. The language should be revised to read that the SANBAG Board may withhold the allocation of funds if an agency failed to submit their annual update to the Five Year Plan.

Policies VVLS-6, -7, -8, -9 and -10e

Policies VVLS -10c and -10d

The 50% requirement should be for the entire five year CIP and not hold for each year individually. The City routinely will program a slurry seal or an overlay projects that may exceed the 50% requirement for a particular fiscal year. Giving more flexibility on this requirement is important to avoid audit problems in unnecessarily naming large numbers of streets and limits.

Policy VVLS-11

Where does the \$100,000 limit come from? This seems to be too low.

Policies VVLS-13 and -14      Eligible and Ineligible Expenditures

Are these the same eligible and ineligible expenditures under the current 1990-2010 Measure I or are there proposed changes? The requirements should be identical to those for State Gas Tax expenditures.

Policy VVLS-19

The current requirement to have contractor's invoices separate the cost for a road project by streets and limits to comply with audit requirements should be removed. It is unnecessary, impractical and very difficult to comply with. In the bid schedules for projects involving multiple streets, the items are all combined for AC paving, road base, etc. Bid items are not separated by streets and limits.

**Victor Valley Major Local Highways Program**

The list of candidate projects should be included. Fig. IV-9 should be deleted. It does not clearly show the projects and emphasizes I-15 and the State highways.

\*Policy VVMLH-2d

The following should be added: "Based on a recommendation of the Victor Valley Subarea Group and Mountain / Desert Committee."

\*Policy VVMLH-2f

"Major improvements" should be changed to "projects".

\*Policy VVMLH-3

Reference should be made to the approved project list. Language should indicate that the master project list will be prepared by the Victor Valley Subarea Group members. Who are the stakeholders?

\*Policy VVMLH-4

The time value of money would relate better to the Caltrans Price Index for Selected Highway Construction Items than the Consumer Price Index. Most of the expenditures will be on construction.

**\*Policy VVMLH-5**

The Capital Projects Needs Analysis (CPNA) should require the minimum amount of information necessary to allocate the MLHP funds in the Mountain / Desert Region to make the process as streamlined as possible.

**\*Policy VVMLH-6**

The timing of allocation of MLHP funds should be flexible to facilitate the delivery of projects. For example, say a project needs to get authorization to proceed with construction by September, has not received a fund allocation from the previous year and would have to wait until March the next year for an SANBAG Board approval. This would delay the project six months. There should be an amendment process to allow for changes from time to time through the year.

**\*Policy VVMLH-9 and -10**

As stated above, the funding sources eligible for the development share should be defined in the Strategic Plan and in the CMP. This will facilitate the expeditious execution of a Project Funding Agreement. SANBAG should not be involved in auditing the City's internal funds.

**Policy VVMLH-22**

How is project oversight defined?

**\*Policy VVMLH-23**

The contingency amount should be defined as up to 10%. Eligible expenditures for contingencies should be defined. There should be a provision for an administrative amendment, similar to what has been used for federal funds such as STP.

**Victor Valley Subarea Senior and Disabled Transit Program**

\*Victorville wants to maintain local control of the potential 2.5% increase in apportionment of funds. The finding of unmet transit needs and potential increase in apportionments should be made independently for each local agency. A CTSA should not be the agency that decides if there should be an increased apportionment above the 5% of Measure I. An increased apportionment for transit has an equal decrease in the local agency's local Measure I funds. The local agency should be in control of these funds.

**Victor Valley Project Development and Traffic Management Systems Program**

What is the interpretation of "contribute to environmental enhancement"?

**Policy VVTMS-3**

There should be some limit on the expenditures in a given year exceeding the funds available; otherwise this would have too large of a decrease in available funding for the Victor Valley Local Streets Program.

Ty Schuiling  
January 21, 2009  
Page 4

Policy VVTMS-8

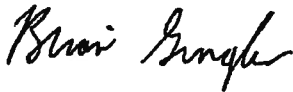
Project selection and prioritization should agree with the Measure I ordinance language and include "to improve traffic flow ..." etc.

Policy VVTMS-9

What are the mandated projects?

Please contact me at (760) 955-5156 if you need to discuss anything or have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Gengler".

Brian Gengler  
Assistant City Engineer

BG/di

cc: Jon Roberts, City Manager  
John A. McGlade, City Engineer

## City of Big Bear Lake



### PUBLIC WORKS/ENGINEERING DIVISION

January 21, 2009

Ty Schulling  
Director of Planning & Programming  
San Bernardino Associated Governments  
1170 W. 3<sup>rd</sup> Street, 2<sup>nd</sup> Floor  
San Bernardino, CA 92410-1715

**RE: Comments on the Draft Measure I 2010-2040 Strategic Plan**

Dear Mr. Schulling:

Per your request, enclosed are our comments on the Draft Measure I 2010-2040 Strategic Plan. In review, we noticed several subareas have specific allocations for regional projects. We understand how these projects are programmed and believe that the projects identified in the *Big Bear Enhanced Ground Access Feasibility Study*, dated December 1996, may warrant the same consideration. In summary, the Study provides a detailed evaluation of both road and non-road transportation alternatives to improve access between San Bernardino Valley and the Big Bear Mountain Recreation area. The study identified several needs for transportation improvements to the Big Bear area. The same mobility constraints identified in the study exist today, predominately relating to the lack of safe, high capacity access routes from the San Bernardino floor basin to the Big Bear area. As you know, access to the mountains is currently provided by three two-lane, undivided highways including SR-330 and SR-18 from the south and west, SR-18(E) from the north and SR-38 from the southeast. The capacity of the highways is limited and results in unacceptable levels of service (LOS D or worse) along most segments. As the study noted, *"Travel up the mountain during dry weather conditions typically takes 45 minutes to an hour. However, accidents can close the roadways for substantial periods and restrict the accessibility of emergency vehicles. During the winter months, snow and ice can lead to extremely dangerous driving conditions, and often triples the driving time. Furthermore, natural disasters and winter storms can shut down one or more highways for substantial periods, forcing tourists and residents to use alternate routes, and cutting off the delivery of goods."*

Comments for Draft Measure I 2010-2040 Strategic Plan  
Page 2

During this past holiday season, when Big Bear received a 35-year record amount of snowfall, all three highways were completely shut down at one point. During the following weekends after the storm, when local businesses depend on the number of visitors and tourists that flock to our area to play in the snow and visit local ski resorts, there were periods in which travel up SR-330 took three to six hours. This kind of wait time poses a very significant public safety issue. In addition, the impact to visitors is indescribable. In this case, lack of adequate transportation has a direct effect on the local economy. What visitor would want to return to our mountaintop to recreate in the forest, shop or dine in our restaurants after having sat in traffic for so long on our main thoroughfares?

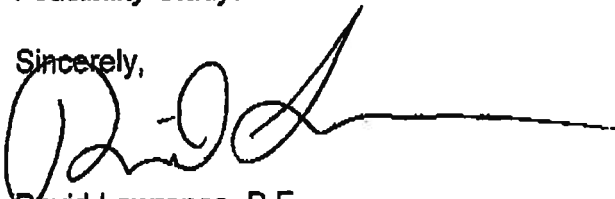
We also believe the feasibility study should be updated to provide for growth that has occurred in the last decade or so. Both the road and non-road transportation projects listed in the study would benefit the entire mountaintop, its residents and the estimated six million visitors to our area.

Our other comments on the draft strategic plan are minor and more technical in nature:

- In regards to Policy 100000-MDLS, Policy MDLS-2 states: "*Local jurisdictions shall not receive their Local Street Allocation until they have submitted their annual update of their Five Year Plan.*" The title "*Five Year Plan*", at least in the last few years of the program, is not in reality a Five Year Plan. The wording may need to reflect that.
- We are requesting to have a portion of funds, possibly 10%, withheld; and not the entire allocation if the Five Year Plan update is not submitted on a timely basis.
- We also would like your agency to consider revising Section D: Eligible Expenditures subsection (a) #10 to include new or rehabilitated wheel chair access ramps as eligible expenditures.

We appreciate the opportunity to comment on this document. Your help is needed to ensure funds our community receives are maximized. We also look forward to receiving favorable news in regards to updating the *Big Bear Enhanced Ground Access Feasibility Study*.

Sincerely,



David Lawrence, P.E.  
Director of Public Works/City Engineer

January 22, 2009

Deborah Barmack, Executive Director  
San Bernardino Associated Governments  
1170 West Third Street, 2<sup>nd</sup> floor  
San Bernardino, California 92401-1715

**Subject: December 4, 2008 Draft Measure I 2010-2040 Strategic Plan**

Dear Ms. Barmack:

Thank you for the opportunity to review and comment on the December 4, 2008 Draft Measure I 2010-2040 Strategic Plan. Enclosed for your consideration is a list of Ontario's comments and requested edits.

Please feel free to contact me at 909-395-2109 or Tom Danna at 909-395-2387 should you have any questions.

Louis Abi-younes  
City Engineer

c: Greg Devereaux  
Otto Kroutil  
Tom Danna



January 9, 2009

December 4, 2008 Draft Measure I 2010-2040 Strategic Plan

| POLICY/PROGRAM   | POLICY NUMBER                  | COMMENT   |
|--|--------------------------------|---|
| 4000-VS/ SB Valley Subarea Policies                                      | ---                            | None  |
| 4000-PA&AE/Valley Project Advancement and Advance Expenditure Agreements | Throughout                     | The acronym for Advance Expenditure Agreement is "AEA" in section III.b, Definitions. However, policy section V and thereafter the acronym is "AE". Change one or the other for consistency.  |
|  | Policy AE-7                    | Add (Note: table to be provided in the Spring 2009 Nexus Study update.)   |
| 4000-VLS/Valley Local Streets Program (pass-thru funds)                  | ---                            | None  |
| 4000-VF/Valley Freeway Program   | ---                            | None  |
| 4000-VFI/Valley Freeway Interchange Program                              | VFI-20                         | Add the following or similar text. SANBAG will be responsible for coordination (collection) of all minority share development contributions for those projects managed by SANBAG. Also, language should be included to state that SANBAG will assist with (facilitate) negotiations between the sponsoring agency and other participating agencies when the sponsoring agency is unable to reach agreement. |
|  | VFI-29, 3 <sup>rd</sup> bullet | Allowance should be made to address cases when it is necessary to purchase an entire parcel even though only a portion of the parcel is needed for the project.   |
|  | VFI-29, 4th bullet             | Recommend adding "except when SANBAG and the local agency mutually agree to a project scope change" to address cases where a change in the project scope is prudent or necessary.   |
|  | VFI-30                         | Provision should be included to pay for justified project cost overruns that are required to satisfy the original or modified project scope on a case-by-case basis.  |
| 4000-VMS/Valley Major Street Program                                     | VMS-23                         | Allowance should be made to address cases when it is necessary to purchase an entire parcel even though only a portion of the parcel is needed for the project. Also, recommend adding "without prior SANBAG approval of a project scope change" to   |

January 9, 2009

December 4, 2008 Draft Measure I 2010-2040 Strategic Plan

|   |                                  |  |  |
|---|----------------------------------|--|--|
|   |                                  |  | address cases where a change in the project scope is prudent or necessary.   |
|   | VMS-24                           |  | Provision should be included to pay for justified project cost overruns that are required to satisfy the original or modified project scope on a case-by-case basis.   |
|   | VMS48                            |  | Allowance should be made to address cases when it is necessary to purchase an entire parcel even though only a portion of the parcel is needed for the project. Also, recommend adding "without prior SANBAG approval of a project scope change" to address cases where a change in the project scope is prudent or necessary. |
| 4000-VMR/Valley Metrolink/Passenger Rail Program        | IV.A & B. 3 <sup>rd</sup> Bullet |  | Pursuant to the recently completed Strategic Planning Study, extend the Metro Gold Line limits form the Montclair Transit Center to the LA/Ontario Airport.  |
|   | Policy VMR-3                     |  | PA&ED, PS&E, right of way and construction of new Metrolink stations should be included as an eligible expenditure. Ontario may eventually have a downtown station on the Riverside Line and/or a new station at our proposed multi-model transportation facility at the LA/Ontario Airport.                                   |
| 4000-VEB/Valley Express Bus & Bus Rapid Transit Program | ---                              |  | None   |
| 4000-VSDT/Valley Senior and Disabled Transit Program    | ---                              |  | None   |
| 4000-VTMS/Valley Traffic Management Systems             | ---                              |  | None   |
|   |                                  |  |  |

## Joanne Cook

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**From:** Ty Schuiling  
**Sent:** Wednesday, January 21, 2009 5:23 PM  
**To:** rcasey@yucaipa.org  
**Cc:** Steven Smith; Joanne Cook  
**Subject:** RE: Strategic Plan

Ray,  
Thank you for your comments. Your first point was discussed and a strategy recommended for approval at today's PPC. Your second point is (in my view) more a Delivery Plan issue than a Strategic Plan issue; I concur that the Strategic Plan wording shouldn't foreclose consideration of alternatives by the Delivery Plan.

Best regards,  
Ty

-----Original Message-----

From: Ray Casey [mailto:rcasey@yucaipa.org]  
Sent: Wednesday, January 21, 2009 4:35 PM  
To: Ty Schuiling  
Cc: "Bill Hemsley"  
Subject:

Ty,

Yucaipa is generally in agreement with the language in the Draft Measure I 2010-2040 Strategic Plan with two requests:

1) Consistent with previous requests, we want to make sure a "bridge" is defined between the Project Advancement process and the Advanced Expenditure process, particularly for those projects that are nearing construction. This should include a clear reimbursement strategy similar to the Project Advancement Program.

2) The I 10 Widening from I-15 to the Riverside County Line is further described as an "Eastbound Truck Climbing Lane Project" further in the document (east of Ford Street). Staff requested, and the Major Projects Committee supported SANBAG staff reviewing the project scope with Yucaipa staff once additional technical information has been made available for Yucaipa staff to review. Our request is to leave some flexibility in the document until that has happened given we believe it was referred to as a full widening in the Measure I documents.

Once again, thank you for your efforts and those of SANBAG's staff in producing this critical document.

Ray

# DEPARTMENT OF PUBLIC WORKS

FLOOD CONTROL • SOLID WASTE MGMT • SURVEYOR • TRANSPORTATION

COUNTY OF SAN BERNARDINO  
PUBLIC AND SUPPORT  
SERVICES GROUP



East Third Street • San Bernardino, CA 92415-0835 • (909) 387-8104  
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VANA R. OLSON  
Director of Public Works

January 21, 2009

**RECEIVED** File: 25.12  
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**JAN 26 2009**

San Bernardino Associated Governments  
1170 W. 3<sup>rd</sup> Street, 2<sup>nd</sup> Floor  
San Bernardino, CA 92410

**SAN BERNARDINO  
ASSOCIATED GOVTS**

Attention: Ty Schuiling  
Director of Planning and Programming

## RE: MEASURE I 2010-2040 DRAFT STRATEGIC PLAN COMMENTS

Dear Mr. Schuiling:

Thank you for the opportunity to comment on the Measure I 2010-2040 Draft Strategic Plan. We have divided our written comments into two attachments. The first identifies policy issues; the second lists typos, outlines incorrect numeration, inconsistency of language between programs, or other technical errors discovered during our review of the document.

As to the policy issues, we have found three primary issues of concern that are addressed either specifically or generally throughout our comments. They are:

1. Administrative management of the Measure I programs. There is a need to streamline the administrative process further, especially for the Major Street Program and the Major Local Highway Programs, to reduce the administrative costs, both for SANBAG and the local agencies. The Draft Strategic Plan is modeled upon the federal and State reimbursement process which can be quite burdensome, requiring a great deal of paperwork and staff time from many County departments and the Board of Supervisors. This takes funds away from actual projects, and over the course of thirty years could amount to hundreds of thousands, if not millions, of dollars in administrative costs. This is certainly contrary to what the voters intended when they supported renewal of the Measure. To address this we propose:
  - a. Further simplification of the Appropriation and Allocation process outlined in the Programs, specifically the Capital Projects Needs Assessment (CPNA) process. The County supports SANBAG's need to project cash flow, but aside from an annual submission of projects for which the local jurisdictions are requesting funding, little flexibility is available to revise, add, or delete projects. Funding requests submitted in September of the fiscal year prior to which the funds will be available does not take into account unforeseen programming changes that may be necessary for local jurisdictions to deliver projects at the earliest possible time. The uncertainty year to year of whether SANBAG will make funds available to locally administered projects already underway places most of the burden for addressing or adjusting to cash flow problems on the backs of local jurisdictions.

MARK H. UFFER  
County Administrative Officer

NORMAN A. KANOLD  
Assistant County Administrator  
Public and Support  
Services Group

#### Board of Supervisors

|                 |                 |               |                 |
|-----------------|-----------------|---------------|-----------------|
| BRAD MITZELFELT | First District  | NEIL DERRY    | Third District  |
| PAUL BIANE      | Second District | GARY C. OVITT | Fourth District |
| JOSIE GONZALES  | Fifth District  |               |                 |

- b. Advancement of reimbursements to local agencies on awarded contracts rather than the proposed monthly reimbursement. The County understands SANBAG's concern regarding cash flow constraints, but the County's cash flow challenges are equally great, if not greater than SANBAG's. For example, due to the current uncertainty of allocations of State and federal funds, Measure I revenue is more reliable at this time than State Gas Tax and Propositions 1B and 42 revenues which fund the vast majority of the transportation maintenance needs of local jurisdictions. Given the more reliable Measure I revenue stream, SANBAG will be in a better position to advance project costs rather than local jurisdictions facing such cash flow challenges.
2. Development Contribution requirements on MI Local Streets Pass-thru funds. This is new to MI 2010-2040 and does not exist in the current Measure. In addition, it only appears in the Mountain/Desert subareas and not the San Bernardino Valley subarea in the Draft Strategic Plan. As the Measure states, Local Streets program funds "may be used flexibly for any eligible transportation purpose determined to be a local priority...." A development contribution requirement would be contrary to this. For example, for MI Major Local Highway projects in the Victor Valley, it would prohibit local jurisdictions from using MI Local Street funds to cover the local development match in the absence of sufficient development contributions, thus delaying delivery of arterial projects vital to address existing traffic congestion and safety needs. We believe SANBAG is broadening the intent of the language contained in the Measure and placing unnecessary limitations on the use of these local funds. As such, we suggest that policies for MI 2010-2040 mirror those applied to Local Streets funds in MI 1990-2010 and remove requirements for development contribution.
3. Lack of a prioritization process in the annual appropriations and allocations. The Draft Strategic Plan does not address how allocation of funding will be prioritized if annual revenues are insufficient to fund all MI program needs. For example, since early on in the development of a Strategic Plan, the County has been concerned with the loss of arterial funds to make up shortfalls in the Freeway Program. Although freeway projects have far higher costs, major arterial roads may in fact be of equal or greater importance to transportation circulation and safety. High priority major arterial road projects, especially those funded previously should be protected from delay or cancellation due to funding shortfalls in the Valley Freeway Program or other programs administered by SANBAG.

Although the three policy issues outlined above are of greatest concern to us, the County has additional policy concerns which are specified in Attachment "A".

Thank you for your review and response to our comments, and we look forward to resolution of any outstanding issues. If we can provide further assistance or clarify our comments, please contact Mazin Kasey, Deputy Director – Transportation, at (909) 387-7916.

Sincerely,



**VANA R. OLSON, P.E.**

Director

VRO:SM:lr  
Attachments

LTR - SANBAG MI Draft Strategic Plan Comments 1-21-09

**ATTACHMENT A**  
**SAN BERNARDINO COUNTY**  
**DRAFT STRATEGIC PLAN COMMENTS – POLICY ISSUES**

**PART 1 – IMPLEMENTATION STRATEGY AND PROGRAM DESCRIPTION**

**I. INTRODUCTION**

No comment

**II. OVERVIEW OF MI 2010-2040 EXPENDITURE PLAN**

No comment

**III. MEASURE I STRATEGIC PLAN FRAMEWORK**

- III.B.2.1 1<sup>st</sup> paragraph, 2<sup>nd</sup> sentence. “In the Valley, year-to-year variation may be allowed in the percentage of revenue that is applied to each program if funds are available in the fiscal year from programs and are not needed to deliver projects.”
- III.B.1.b pg III-5, 2<sup>nd</sup> bullet. Rather than “Avoid obtaining federal earmarks for smaller scale projects...” Suggest “Avoid obtaining federal earmarks insufficient to cover the cost of additional environmental clearance.” For example, if a federal earmark is \$1 million on a \$3 million project and additional costs for NEPA are \$500K, aren’t we still ahead \$500K? Why give up any additional funding?
- III.B.2.2 Will SANBAG have control over local jurisdiction projects that it deems are “inefficient” and “wasteful?” How will these be determined?
- III.B.2.4 “State Highways” needs to be defined. Does this mean freeways or highways like SH-18, SH-247, etc. SANBAG and Caltrans can partner on Freeways but local jurisdictions also work with Caltrans on State Highways (e.g. SR18 in Lucerne).
- III.B.3 pg 111-10, 3<sup>rd</sup> bullet, “The SANBAG Board may allow exceptions to this principle when significant potential benefits exist to the delivery of Measure I projects.” What are “significant potential benefits?” Will debt service in one program be allowed to reduce project delivery in another by borrowing from a program and not being able to pay it back? Need policy language to address this.
- III.B.4 - pg III-11, 2<sup>nd</sup> bullet. If projects are delayed by unanticipated environmental or r/w issues and funds are not expended as planned, SANBAG should not take those funds away and use them on other projects/programs without consultation with local jurisdiction
- pg III-12, 5<sup>th</sup> bullet. What does this mean? This needs to be clarified.

#### **IV. MEASURE I SUBAREA PROGRAMS**

No Comment

#### **IV. CAJON PASS EXPENDITURE PLAN**

IV.A.4 Add: further analysis of bonding availability and costs needed.

#### **IV.B SAN BERNARDINO VALLEY PROGRAMS**

##### **SB VALLEY APPORTIONMENT, ALLOCATION & EXPENDITURE PROCESS**

- pg IV-7, Apportionment Recommendation: Current projects need to be exempt from possibly not receiving apportionment percentage due to cash flow needs in other programs. Withholding percentage share from projects for which SANBAG has committed funding jeopardizes project completion and leads to delays and inefficiency.

- IV.B.1.b - Step 2, pg IV-7, Apportionment Recommendation. Policy language needs to address prioritization process between programs when there is a funding shortfall.
- Step 4, pg IV-10, Reimbursement should occur for unforeseen cost increases over which local jurisdictions have no power. Add "unless approved prior" after scope of work.

##### **VALLEY PROJECT ADVANCEMENT/ADVANCE EXPENDITURE PROCESS**

- IV.B.2.a - pg IV-12, 1<sup>st</sup> full paragraph. "PAA repayment disbursements occurs quarterly in order of the date of expenditure as documents by consultant and contractor invoices, or documentation for in-house work performed by local jurisdictional staff, reflecting actual project expenditures." We need language to allow us to get reimbursed for design, environmental clearance, r/w, etc. performed by County staff.
- IV.B.2.b - pg IV-13, Valley Major Street AE Process. This paragraph should state that reimbursement will come from a jurisdiction's fair-share allocation and not reduce allocations to other jurisdictions.

##### **VALLEY LOCAL STREETS PROGRAM**

No comment

##### **VALLEY FREEWAY PROGRAM**

No comment

#### VALLEY FREEWAY INTERCHANGE PROGRAM

No comment

#### VALLEY MAJOR STREET PROGRAM

IV.B.6.a -pg IV-30, 4<sup>th</sup> paragraph. Should also state that upon award of contracts, SANBAG will allocate full contract amount to reduce administrative costs of monthly invoicing to be consistent with the last sentence on IV-35.

IV.B.6.a.2 -pg IV-35, last paragraph. Should have language stating that if unused portion of funds is borrowed by other programs, payback and availability will be guaranteed in the fiscal year needed by local jurisdictions to deliver arterial projects.

#### VALLEY METROLINK AND PASSENGER RAIL PROGRAM

No comment

#### VALLEY EXPRESS BUS/BUS RAPID TRANSIT PROGRAM

No comment

#### VALLEY SENIOR AND DISABLED TRANSIT PROGRAM

No comment

#### VALLEY TRAFFIC MANAGEMENT SYSTEMS PROGRAM

No comment

#### IV.C VICTOR VALLEY SUBAREA PROGRAMS

Throughout the Victor Valley Subarea Programs, language should be added to differentiate between the urban and rural areas, especially in references to the SANBAG Nexus Study and development contributions.

#### VV LOCAL STREET PROGRAM

See above

#### VV MAJOR LOCAL HIGHWAYS PROGRAM

IV.C.1.b - pg IV-51 – 2<sup>nd</sup> and 3<sup>rd</sup> paragraphs should be deleted. The Local Streets Program is not part of the Nexus Study and the last two paragraphs in this section make it sound like the Local Street Program is part of the SANBAG Nexus Study. This is incorrect



and confusing and should be removed.

- Language should be added to at least differentiate between urbanized Nexus Study areas and rural non-Nexus Study areas within the VV subarea.

IV.C.2.a - Step 1: First paragraph states that the CPNA is the principal tool used to determine project and program funding needs, which implies that other tools can be used, but the CPNA is the principal one. Yet, Policy VVMLH-5 restricts project and programming funding need tools to the CPNA. Policy VVMLH-5 needs to be modified to reflect that there is more than one programming tool. Also, County will need some sort of exception to the identification of needs for rural areas of the county that are outside of the Nexus Study area. Those residents pay sales taxes but will receive no benefits under the SANBAG proposal.

- Step 2: Cash Flow Analysis: Why do we need to do a CPNA, which is a long process when we have established a list of priorities?

- Step 3: - 2<sup>nd</sup> paragraph. There are some areas of the unincorporated areas of the county that do not have development mitigation commitments. What then? See comments for Step 1.

- Step 3: 3<sup>rd</sup> paragraph. This requirement for a fully executed Development Mitigation Cooperative Agreement could prohibit project development by individual jurisdictions. If one jurisdiction wants to advance a project through project development/design phases to get it shelf-ready, it should be able to tap into MI public share funds even if other agencies sharing jurisdiction do not have the development contribution funding available at the time. Add language in which a local jurisdiction accepts full responsibility for development contribution or has a fully executed agreement.

IV.C.2.b pg IV-57, 2<sup>nd</sup> to the last paragraph, 2<sup>nd</sup> to the last sentence. The 40% rate applies to the Valley MLH program. 20% was the figure established during discussions with Victor Valley jurisdictions and SANBAG staff. In addition, language should be included to establish that if a local jurisdiction uses up its 30-year allocation under the or 20% reimbursement, they can make no claim for funds under the remaining 80% without agreement from the other jurisdictions.

IV.C.2.c pg IV-58, 3<sup>rd</sup> paragraph. Same issue as in SB Valley Project Advancement/Advance Expenditure Agreements in IV.B.2.b above, except that this may apply to Vista Road Grade Sep and Rock Springs Road Bridge Replacement projects.

## VV SENIOR AND DISABLED TRANSIT PROGRAM

No comment

#### VV PROJECT DEVELOPMENT AND TRAFFIC MANAGEMENT SYSTEMS

No comment

#### IV.D RURAL MOUNTAIN/DESERT SUBAREA PROGRAMS

##### RURAL MOUNTAIN/DESERT LOCAL STREET PROGRAM

No comment

##### RURAL MOUNTAIN/DESERT MAJOR LOCAL HIGHWAYS PROGRAM

IV.D.2.b pg IV-69, last paragraph of Financial Analysis discusses returning revenue after 5 years of revenue upon a finding made by Mountain/Desert committee. This should also be part of the Victor Valley section also.

IV.D.2.d Cities and County within each rural subarea should develop a MLH priority project list similar to the VV subarea

##### RURAL MOUNTAIN/DESERT SENIOR AND DISABLED TRANSIT PROGRAM

No comment

#### RURAL MOUNTAIN/DESERT PROJECT DEVELOPMENT AND TRAFFIC MANAGEMENT SYSTEMS PROGRAM

No comment

## **PART II – MEASURE I POLICIES**

### **VALLEY SUBAREA**

#### **POLICY 40000 VS – VALLEY SUBAREA (pg 1-4)**

- IV.D Policy VS-15: Should add language that SANBAG will commit to fund all phases of a project once approved.
- IV.F Policy VS-24: rather than “actively advocate for its share of State and federal dollars,” why not stronger language, such as “actively advocate for an increasingly greater share of State and federal dollars.”

#### **POLICY 40000 PA&AE – VALLEY PROJECT ADVANCEMENT AND ADVANCE EXPENDITURE (pg 5-8)**

- IV.A Exceptions to the January 31, 2009 initiate construction deadline need to be made for Cherry, Cedar, and Pepper interchange projects.
- IV.B Policy PA-10. Percentage should not be increased if time of reimbursement becomes greater than 6 years unless this policy has already been adopted by SANBAG Board.
- V.B. Freeway Interchange Program and Railgrade/Highway Grade Separation Sub-program Projects–Policy AE-6. This should be eliminated. Public share of costs incurred after approval of Nexus study should be included.

#### **POLICY 40000 VLS – VALLEY LOCAL STREETS (pg 9-14)**

- III Definitions p. 1 of 6 – Local Street projects – add interchanges to list
- IV.C Policy VLS-8 (a.) Construction
  - add design, planning, and support costs to list.
  - should also include improvements to handicap ramps to make them ADA compliant

#### **POLICY 40000 VF – VALLEY FREEWAY (pg 15-16)**

No comment

#### **POLICY 4000 VFI – VALLEY FREEWAY INTERCHANGE (pg 17-21)**

- IV.A Policy VFI-3 – this should also be in arterial section
- IV.B Policy VFI-5: Should not be limited only to R/W phase. This should apply to large Design and Construction phase contracts when awarded. SANBAG should allocate funds upon award of a contract to reduce cash flow issues with Local agencies
- IV.F Policy VFI-13: SANBAG will require development share of cost even if they initiate an

interchange project to facilitate delivery of a freeway project. How is this possible if local agencies do not have their development share? Need language clarified to require SANBAG to front development share if local jurisdiction doesn't have it or has another priority interchange project underway that would be delayed.

Policy VFI-17, last sentence states "Sponsoring agencies shall not be reimbursed for any costs incurred prior to the execution of the Project Funding Agreement." Creates problem with Cherry, Cedar, and Pepper interchanges where County has already used local funds to advance interchange improvements. We would like those expenditures acknowledged as local match toward public share of projects.

IV.H pg 20, 3<sup>rd</sup> bullet: Language should be added that Major Streets Program funds will not be taken if interchange project was initiated by SANBAG as part of a mainline freeway project. SANBAG would be loaning development contributions to local jurisdictions without giving local jurisdictions the right of refusal and then penalizing for slow development rate by canceling delivery of arterial projects. In essence, local jurisdictions could be forced to fund interchange improvements and freeway projects using their Major Street Program funds.

(page 20) – 2<sup>nd</sup> Bullet. On August 6, 2008, The SANBAG Board approved language allowing for repayment period longer than 10 years on an exception basis, subject to Board of Approval, if projected or collected development fees are insufficient for repayment during the 10-year time frame. This language is missing from this policy and needs to be included.

-3<sup>rd</sup> bullet - In addition, the Board approved language stating that *"neither SANBAG nor local jurisdictions are obligated to enter into loan agreements for these projects."*

This language is also missing from this policy and needs to be included.

#### **POLICY 40000 VMS – VALLEY MAJOR STREETS (pg 22-28)**

No comment

#### **RAIL-HIGHWAY GRADE SEPARATION SUB-PROGRAM**

V.B Policy VMS-7: Like Policy VFI-5 in Freeway Interchange Program, advanced reimbursement should not be limited only to R/W phase. This should apply to large Design and Construction phase contracts when awarded.

#### **ARTERIAL SUB-PROGRAM**

No comment

#### **POLICY 40000 VMPR – VALLEY METROLINK/PASSENGER RAIL (pg 29-30)**

No comment

**POLICY 40000 VEB – VALLEY EXPRESS BUS & BUS RAPID TRANSIT (pg 31-33)**

No comment

**POLICY 40000 VSDT – VALLEY SENIOR AND DISABLED TRANSIT (pg 34-36)**

No comment

**POLICY 40000 VTMS – VALLEY TRAFFIC MANAGEMENT SYSTEMS (pg 37-38)**

No comment

**VICTOR VALLEY SUBAREA**

**POLICY 40000 VVPA&AE – VV PROJECT ADVANCEMENT AND ADVANCE EXPENDITURE (pg 39-41)**

IV.B Policy VVPA-9: Should also state that reimbursement amount will be accounted for toward a jurisdiction's fair-share allocation and not reduce allocations to other jurisdictions.

V.A Policy VVAE-2: This excludes projects in unincorporated areas of the Victor Valley not in cities' spheres of influence, such as Vista Road grade sep. Language should state, "Only projects included in the Victor Valley MLH candidate project list and included in the most recent Board-approved version of the Development Mitigation Nexus Study as applicable for urbanized areas of the Victor Valley shall be eligible for the AE program."

**POLICY 4000 VVLS – VV LOCAL STREETS (pg 42-48)**

IV.B Policy VVLS-8: This will prohibit a jurisdiction from using pass-thru MI on a Nexus Study Road (like Ranchero) .

IV.C The same language should be used for this section as is found in Valley Local Streets Program and Rural Mountain/Desert Local Streets Program policies. Should be consistent through all 3 programs since jurisdictions are adopting a single 5 year plan for local pass-thru funds.

**POLICY 40000 VVMLH – VV MAJOR LOCAL HIGHWAYS (pg 49-53)**

IV.C Policy VVMLH-12: Should include large contracts for Environmental and Design phases as well.

**POLICY 40000 VVSDT – VV SENIOR & DISABLED TRANSIT (pg 54-57)**

No comment

**POLICY 40000 VVTMS – VV PROJECT DEVELOPMENT & TRAFFIC  
MANAGEMENT SYSTEMS (pg 58-59)**

No comment

**POLICY 40000 MDLS – RURAL MOUNTAIN/DESERT LOCAL STREETS (pg 60-66)**

IV.A Policy MDLS-4 and MDLS-5 should also be included in the Victor Valley Local Streets policies?

**POLICY 40000 MDMLH – RURAL MOUNTAIN/DESERT MAJOR LOCAL HIGHWAYS  
(pg 67-70)**

IV.C Policy MDMLH-10: should include large contracts for Environmental and Design phases as well.

**POLICY 40000 MDSDT – RURAL MOUNTAIN/DESERT SENIOR & DISABLED  
TRANSIT (pg 71-73)**

No comment

**POLICY 40000 MDTMS – RURAL MOUNTAIN/DESERT PROJECT DEVELOPMENT  
& TRAFFIC MANAGEMENT SYSTEMS (pg 74-75)**

No comment

**POLICY 40000 ITOC – INDEPENDENT TAXPAYER OVERSIGHT COMMITTEE (pg  
76-78)**

No comment

**ATTACHMENT B**  
**SAN BERNARDINO COUNTY**  
**DRAFT STRATEGIC PLAN COMMENTS – TECHNICAL CORRECTIONS**

**PART 1 – IMPLEMENTATION STRATEGY AND PROGRAM DESCRIPTION**

**I. INTRODUCTION**

No comment

**II. OVERVIEW OF MI 2010-2040 EXPENDITURE PLAN**

- II.B.1 - Should be II.B.2
  - Percentages in Table II-1 do not add up to 100%
- II.B.1.c - “Shelf-ready” needs to be defined for clarity. Each local jurisdiction may have a different interpretation is of what is “shelf-ready.”
- II.C.2.2 top of page 11-12, should read “are: Barstow, Big Bear Lake, Needles, Twentynine Palms, Yucca Valley and the County of San Bernardino for unincorporated areas in the Mountain/Desert Subareas.
- II.D Figure II-4 on page 11-13 should be labeled Figure II-2
- II.D - Should be II.E
- II.E Should be II.F

**III. MEASURE I STRATEGIC PLAN FRAMEWORK**

- III.A 1<sup>st</sup> paragraph: Did the SANBAG Board “endorse” or did the “adopt” these principles?
- III.B.2.3 - “Shelf-ready” needs to be defined for clarity. Each local jurisdiction may have a different interpretation is of what is “shelf-ready.”
- III.B.2.4 Is the “Program Control System” only for freeway, interchange and grade seps, or does it include local arterial projects too?
- III.B.4 - pg III-10, Strategy 4,
  - 1<sup>st</sup> bullet. Many projects have to be federalized anyway. Clarity for this paragraph needed. SANBAG alternative process is still costly, so no savings can be anticipated.
  - 2<sup>nd</sup> bullet should be “Limit the use of federal funds to...”, not “on”.
  - pgs III-11-12 Bulleted items need greater clarification..

**IV. MEASURE I SUBAREA PROGRAMS**

No Comment

#### IV. CAJON PASS EXPENDITURE PLAN

· No comment

#### IV.B SAN BERNARDINO VALLEY PROGRAMS

##### SB VALLEY APPORTIONMENT, ALLOCATION & EXPENDITURE PROCESS

IV.B.1.a - Figure IV-1 (page IV-5) Fund Expenditure, this should read “the following fiscal year.” If allocations are made in March, the fiscal year ends in June, leaving a scant two months for expenditure.

IV.B.1.b - Step 4, pg IV-9, Jurisdiction Master Agreement, 2<sup>nd</sup> to last sentence. Should read, “Each year, or more often as needed, the Jurisdiction Master Agreement is amended...” This will allow changes to project lists and shift funds mid-year rather than having to wait until the next fiscal year if we need to. Also, it should state that SANBAG will prepare these agreements prior to July 1<sup>st</sup> unless otherwise requested by the local jurisdiction to insure that funds will be available July 1st in the next fiscal year.

##### VALLEY PROJECT ADVANCEMENT/ADVANCE EXPENDITURE PROCESS

No comment

##### VALLEY LOCAL STREETS PROGRAM

IV.B.3.a 2<sup>nd</sup> to the last sentence should read “Local Streets Project funds shall be disbursed monthly...” To clarify that disbursements are not done on an annual basis.

##### VALLEY FREEWAY PROGRAM

IV.B.4.b - pg IV-19, 2<sup>nd</sup> paragraph, states “A set of policies was also developed to provide direction for allocation of State and federal funds for Valley programs. These policies are documented in Section IV.B.1.” There is no language in Section IV.B.1 addressing allocation of State and federal funds. Probably it should be III.B.1. - pg IV-21, Revenue, 2<sup>nd</sup> paragraph. This states that 100% of all State and federal funds will go to Freeway program, except those already committed to certain interchanges and grade separations. Compare with Freeway Interchange program, pg IV-28, IV.B.5.b, Financial Analysis, 2<sup>nd</sup> paragraph, it sounds like Interchange Program will still need State and federal funds to be fully funded. Is there a contradiction here?



#### VALLEY FREEWAY INTERCHANGE PROGRAM

IV.B.5.b See second comment under IV.B.4.b above.

#### VALLEY MAJOR STREET PROGRAM

No comment

#### VALLEY METROLINK AND PASSENGER RAIL PROGRAM

No comment

#### VALLEY EXPRESS BUS/BUS RAPID TRANSIT PROGRAM

No comment

#### VALLEY SENIOR AND DISABLED TRANSIT PROGRAM

No comment

#### VALLEY TRAFFIC MANAGEMENT SYSTEMS PROGRAM

No comment

### IV.C VICTOR VALLEY SUBAREA PROGRAMS

#### VV LOCAL STREET PROGRAM

No comment

#### VV MAJOR LOCAL HIGHWAYS PROGRAM

IV.C.1.a 2<sup>nd</sup> paragraph, last sentence should read "Local Streets Project funds shall be disbursed monthly..." to clarify that disbursements are not done on an annual basis.

IV.C.2.c. IV.C.2.c Program Policies should be IV.C.2.d

IV.C.2.d IV.C.2.d Implementation Actions should be IV.C.2.e

#### VV SENIOR AND DISABLED TRANSIT PROGRAM

IV.C.3.a 1<sup>st</sup> paragraph states, "Such increases shall automatically occur unless each local jurisdiction within the subarea makes a finding..." Does this mean one or more jurisdictions could opt out or does it mean that all jurisdictions must make the finding? Language should be clarified.

IV.C.3.d No comment

## VV PROJECT DEVELOPMENT AND TRAFFIC MANAGEMENT SYSTEMS

No comment

### IV.D RURAL MOUNTAIN/DESERT SUBAREA PROGRAMS

#### RURAL MOUNTAIN/DESERT LOCAL STREET PROGRAM

IV.D.1.a 2<sup>nd</sup> paragraph, 2<sup>nd</sup> paragraph, last sentence should read “Local Streets Project funds shall be disbursed monthly...” to clarify that disbursements are not done on an annual basis.

#### RURAL MOUNTAIN/DESERT MAJOR LOCAL HIGHWAYS PROGRAM

No comment

#### RURAL MOUNTAIN/DESERT SENIOR AND DISABLED TRANSIT PROGRAM

IV.D.3.b Total figure in chart should be \$24,420,000.

### RURAL MOUNTAIN/DESERT PROJECT DEVELOPMENT AND TRAFFIC MANAGEMENT SYSTEMS PROGRAM

No comment

## PART II – MEASURE I POLICIES

### VALLEY SUBAREA

#### POLICY 40000 VS – VALLEY SUBAREA (pg 1-4)

III. “d” & “e” should specify the type of programs as it does in Part I, e.g. Jurisdiction Master Agreement for arterial projects and Project Funding Agreement for Interchange and grade sep projects?

IV.B There are duplicate IV.B’s. The sections will have to be renumbered.

V.A. General Policies –Policy AE-2. Please clarify “most recent Board-approved version of the Development Mitigation nexus Study”

#### POLICY 40000 PA&AE – VALLEY PROJECT ADVANCEMENT AND ADVANCE EXPENDITURE (pg 5-8)

No comment

**POLICY 40000 VLS – VALLEY LOCAL STREETS (pg 9-14)**

- D. Ineligible expenses – 7- Clarify this work outside right of way
- D. Ineligible expenses – 9- County has some cattle guard crossings in rural area and should be eligible if part of road project
- D. Ineligible expenses – 12- clarify

**POLICY 40000 VF – VALLEY FREEWAY (pg 15-16)**

No comment

**POLICY 4000 VFI – VALLEY FREEWAY INTERCHANGE (pg 17-21)**

- IV. J - Clarify “support costs.” Should be as noted in approved SANBAG policy F “Exclude project management costs, with exception of construction support costs”
- IV . K Policy VFI-30 – add “unless approved”
- IV. L Policy VFI-34 – should also be per nexus percentages

**POLICY 40000 VMS – VALLEY MAJOR STREETS (pg 22-28)**

No comment

**RAIL-HIGHWAY GRADE SEPARATION SUB-PROGRAM**

- V.I 2<sup>nd</sup> bullet: How are “project oversight costs” defined? Shouldn’t this say “project management costs” to be consistent with the Board adopted guidelines (Attachment 1 in August 6, 2008 agenda, Item#7)
- V.K Policy VMS 25: Under what conditions will SANBAG decide to assume project management responsibilities? These are specified in the Freeway Interchange Program under policy VFI-31, but not here. Do the same apply?

**ARTERIAL SUB-PROGRAM**

No comment

**POLICY 40000 VMPR – VALLEY METROLINK/PASSENGER RAIL (pg 29-30)**

No comment

**POLICY 40000 VEB – VALLEY EXPRESS BUS & BUS RAPID TRANSIT (pg 31-33)**

No comment

**POLICY 40000 VSDT – VALLEY SENIOR AND DISABLED TRANSIT (pg 34-36)**

IV.C Policy VSDT-5: Since LTF comes from actual sales tax collected, shouldn't maintenance of effort be determined based upon changes in statewide sales tax revenues year to year rather than consumer price index? This is indirectly suggested in Policy VSDT-6 (a)(2).

POLICY 40000 VTMS – VALLEY TRAFFIC MANAGEMENT SYSTEMS (pg 37-38)

VI. Should be V.

### **VICTOR VALLEY SUBAREA**

POLICY 40000 VVPA&AE – VV PROJECT ADVANCEMENT AND ADVANCE EXPENDITURE (pg 39-41)

No comment

POLICY 4000 VVLS – VV LOCAL STREETS (pg 42-48)

IV.A Last paragraph in section states “will occur automatically unless each local jurisdiction within the subarea makes a finding...” Does this mean one or more jurisdictions could opt out or does it mean that all jurisdictions must make the finding? Language should be clarified.

POLICY 40000 VVMLH – VV MAJOR LOCAL HIGHWAYS (pg 49-53)

IV.A Policy VVMLH-6: Should be consistent with SB Valley Fund apportionment Policy VS-14 which states “the SANBAG Board of Directors shall apportion funds by its February meeting...,” not “In approximately February each year, the SANBAG Board shall apportion...” as written in this policy.

In the VV Major Local Highways Program Description in Part 1, item IV.C.2.a, Step 1, the first paragraph states that the CPNA is the principal tool used to determine project and program funding needs, which implies that other tools can be used, but the CPNA is the principal one. Yet, Policy VVMLH-5 restricts project and programming funding need tools to the CPNA. Policy VVMLH-5 needs to be modified to reflect that there is more than one programming tool for consistency with item IV.C.2.a.

POLICY 40000 VVSDT – VV SENIOR & DISABLED TRANSIT (pg 54-57)

IV.A Policy VVSDT-2: See comment on VV Local Streets IV.A above.

POLICY 40000 VVTMS – VV PROJECT DEVELOPMENT & TRAFFIC

**MANAGEMENT SYSTEMS (pg 58-59)**

- IV.C Policy VVTMS-6: Should state “in March of each year...” instead of “in approximately March of each year...” to be consistent with SB Valley Appropriation and Allocation language.

**POLICY 40000 MDLS – RURAL MOUNTAIN/DESERT LOCAL STREETS (pg 60-66)**

- IV.A Shouldn't Policy MDLS-4 and MDLS-5 also be included in the Victor Valley Local Streets policies?
- IV.F Policy OMDLS-17 should be new paragraph. And #2 & #3 should be separate policies to be consistent with SB Valley and VV Valley Local Streets policies.

**POLICY 40000 MDMLH – RURAL MOUNTAIN/DESERT MAJOR LOCAL HIGHWAYS (pg 67-70)**

- IV.A Policy MDMLH-2 (c): Should state “Allocations may serve...” not “Allocations shall serve...”

**POLICY 40000 MDSDT – RURAL MOUNTAIN/DESERT SENIOR & DISABLED TRANSIT (pg 71-73)**

- IV.B B (2) (b) 2<sup>nd</sup> line, Program I, typo

**POLICY 40000 MDTMS – RURAL MOUNTAIN/DESERT PROJECT DEVELOPMENT & TRAFFIC MANAGEMENT SYSTEMS (pg 74-75)**

- IV.C Policy MDTMS-6: Should state “in March of each year...” instead of “in approximately March of each year...” to be consistent with SB Valley Appropriation and Allocation language.

**POLICY 40000 ITOC – INDEPENDENT TAXPAYER OVERSIGHT COMMITTEE (pg 76-78)**

No comment



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Mayor

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Bea Cortez  
Jim T. Miller  
Walt Stanckiewicz

Thomas J. Schwab  
City Manager

January 15, 2009

Steve Smith, P.E.  
San Bernardino Associated Governments  
1170 W. 3rd St., Second Floor  
San Bernardino, CA 92401-1715

Subject: **Comments on SANBAG's Draft Measure I 2010 to 2040 Strategic Plan (December 4, 2008)**

Dear Steve,

Thank you for giving us the opportunity to review the Draft Measure I 2010-2040 Strategic Plan. The following comments are submitted for your consideration.

**Major Street Program**

**Page II-5**

Equitable distribution of funding from this program should be a priority. Plan states the following: "equitable geographic distribution of projects shall be taken in account over the life of the program". This should be revised to "equitable distribution of funding shall be taken into account annually as funding is allocated".

**Page III-12**

Plan should elaborate on the terms "risk design" and "utilize risk management". It is not clear from the text what these terms mean or how they will be applied.

**Page IV-6**

Capital Projects Needs Analysis (CPNA) - local agencies that do not have active projects being funded by Measure I and do not intend to submit for funding in the subsequent year should be exempted from the requirement to prepare a CPNA.

**Page IV-7**

Apportionment recommendations - geographic equity should be added as a factor to be considered for the apportionment of funds. As part of the recommendation process, SANBAG staff should report on the apportionment of program funds to date to the local agencies. This

report will facilitate and promote geographic equitable distribution of program funds as part of the decision-making process in the apportionment of the Major Street Program funds.

Page IV-12

The plan should state that local agencies have flexibility in meeting their development mitigation funding requirement. For example, the local agencies should have the capability to substitute funds from alternative sources such as the general fund or redevelopment funds.

#### **Valley Freeway Program**

Page IV-20

The Interstate 215 widening from Riverside County to Interstate 10 should be designated as the highest priority project in the Freeway Program. This is because it is the only remaining unfunded project from the original Measure I program. In addition, successful completion of the project will entail a major investment in effort to coordinate with RCTC. As such, the project should be identified as the highest priority to ensure that an appropriate level of effort is allocated to ensure successful completion of this project.

If you have additional questions concerning these comments please contact our transportation consultant, Craig S. Neustaedter at 909-263-0383.

Sincerely,



Steve Berry  
Acting City Manager

xc: Council Woman Bea Cortes



OFFICE OF THE CITY MANAGER

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Mr. Ty Schuiling  
Director of Planning & Programming  
SANBAG  
1170 W. 3<sup>rd</sup> Street, 2<sup>nd</sup> Floor  
San Bernardino, CA 92410

|                   |              |         |                |            |   |
|-------------------|--------------|---------|----------------|------------|---|
| Post-it® Fax/Note | 7671         | Date    | 1/21/09        | # of pages | 2 |
| To                | Ty Schuiling | From    | Mark W. SINGAR |            |   |
| Co./Dept.         | Sanbag       | Co.     |                |            |   |
| Phone #           |              | Phone # | 384-5122       |            |   |
| Fax #             | 885-4407     | Fax #   |                |            |   |

Subject: Draft Measure I 2010-2040 Strategic Plan Comment Letter

Dear Mr. Schuiling:

This letter will serve as formal comment to San Bernardino Association of Governments (SANBAG) Draft Measure I 2010-2040 Strategic Plan. As mass transit becomes more prevalent and needed in this region it is vital that the resources are provided to ensure adequate maintenance of these new guideways to move people to destinations throughout the San Bernardino Valley. As a regionally beneficial program, the Valley Express Bus & Bus Rapid Transit (BRT) Program is critical to the success of mass transit in the San Bernardino Valley.

A key component of the BRT system is the use of dedicated guideways, or travel lanes, that are used solely for the purposes of the buses. The use of these guideways allows for faster travel times and shorter headways, thereby resulting in increased ridership. The City of San Bernardino believes that the ongoing maintenance of these dedicated guideways should be allowable reimbursable expenses under the Valley Express Bus & Bus Rapid Transit (BRT) Program.

Policy VEB-3 states that, "Eligible projects shall include contributions to operating and capital costs associated with implementing high-speed, express-type bus service in high density travel corridors." The policy goes on to state that, "Capital costs shall include: the construction of dedicated BRT guideways..." The City believes that since maintenance of the dedicated guideways is not precluded from operating costs, it is an allowable expense. However, it should be expressly stated that maintenance of the dedicated guideways is an eligible expense.

The City proposes the addition of a sentence indicating that operating expenses include the maintenance of dedicated BRT guideways. This addition would allow the 13 cities that will eventually be the beneficiaries of the eight additional BRT systems to maintain these regionally beneficial high speed corridors at a high quality level and avoid their deterioration. Additionally, by providing for maintenance of these dedicated guideways

CITY OF SAN BERNARDINO

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through the Valley Express Bus & Bus Rapid Transit (BRT) Program, cities won't be obligated to use the funds allocated through the Local Streets Program to maintain the BRT dedicated guideways.

The City of San Bernardino appreciates the opportunity to provide comments to SANBAG prior to the adoption of the Measure I 2010-2040 Strategic Plan. Should there be any questions or comments to this letter, please contact Assistant City Manager, Lori Sassoon at 909-348-5122.

Sincerely,



Mark Weinberg  
Interim City Manager

January 26, 2009

City of  
**HIGHLAND**  
Inc. 1987



**RECEIVED**

**JAN 28 2009**

**SAN BERNARDINO  
ASSOCIATED GOVTS**

Ty Schuiling  
SANBAG Director of Planning & Programming  
San Bernardino Associated Governments  
1170 W. 3<sup>rd</sup> Street, 2<sup>nd</sup> Floor  
San Bernardino, CA 92410

Mr. Schuiling:

Below are comments from City of Highland on the Draft Measure I 2010-2040 Strategic Plan dated December 4, 2008:

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Penny Lilburn

Mayor Pro-Tem  
Ross B. Jones

Larry McCallon  
Jody Scott  
John P. Timmer

City Manager  
Joseph A. Hughes

Part 1

Figure IV-5: The City intends to make some changes to its arterial project list in the next cycle of Nexus Study update. However, until the new Nexus Study is adopted, Figure IV-5 should be consistent with the current arterial project list shown in Attachment 1 of the current Nexus Study. Please show the following projects in the figure:

- Extend Base Line from easterly terminus to Greenspot Road from 0 to 2 lanes
- Widen Base Line from Church Avenue to Boulder Avenue from 4 lanes to 6 lanes (including bridge widening)
- Widen Greenspot Road from Shelton to Aplin Street from 2 to 4 lanes
- Widen Greenspot Road from Aplin Street to East City Limits from 2 to 4 lanes
- Widen Highland Avenue from Boulder Avenue to 200' west of Denair Avenue from 2 to 4 lanes
- Widen Highland Avenue from Olive Street to 800' west of Victoria Avenue from 2 to 4 lanes
- Widen Lankershim Avenue from 5<sup>th</sup> Street to 1200' north of 9<sup>th</sup> Street from 3 to 4 lanes
- Widen Newport Avenue from South City Limits to Greenspot Road from 2 to 4 lanes.

Part 2

San Bernardino Valley Subarea Policies

Definitions: e. Project Funding Agreement – Modify to read “An agreement for an interchange or a grade separation project between SANBAG and a local jurisdiction ....”

Policy VS-1: Add reference to Policy VS-3 regarding time-value of money.

Policy VS-3: What is base year used for calculation of time-value of money? Suggest adding a sample calculation in Part 1 of the Strategic Plan to illustrate how the time-value of money is determined.

Policy VS-4: This policy sounds like local jurisdictions are involved in submittal of “all” programs, which is not consistent with Policy VS-6. Please clarify.

#### Valley Project Advancement and Advance Expenditure Policies

Policy PA-8: Suggest language – “...public share of either the Nexus Study project cost or the actual project cost, whichever is less.”

Policy PA-11: Replace “contractor” with “contractor/consultant” in two places.

Policy AE-9 and AE-10: Policy AE-9 indicates the amount of reimbursement is determined by the project cost in the Nexus Study, but Policy AE-10 indicates the amount of reimbursement is also limited by the actual cost. Suggest combining the two policies into one policy to avoid any inconsistency.

Limiting the amount of reimbursement for an interchange project to the project cost listed in the Nexus Study prevailing at the time the Advance Expenditure Agreement is approved is too huge of a risk for a local jurisdiction to take if the Agreement is for the PSR or PA&ED phases of the project. This is because the project cost listed in the Nexus Study could be significantly less than the actual project cost, and the local jurisdiction often does not have a relatively good project cost estimate until it has completed the PA&ED phase or at least the PSR phase of the project.

The Advance Expenditure Agreement for the PSR or PA&ED phases of an interchange project should not limit the amount of reimbursement, and that only the Agreement for construction would limit the amount of reimbursement to that listed in the Nexus Study that is prevailing at the time the Agreement for construction is approved.

Policy AE-12: First bullet point – Suggest language “... projects cost incurred after April 5, 2006 but prior to the commencement of Measure I 2010-2040 (April 1, 2010)...”

#### Valley Local Street Program Policies

Policy VLS-8: Include environmental studies and mitigation, design, right-of-way acquisition, and project management as part of eligible expenditures.

7) Add “installation of new culvert”.

25) Replace “major signs” with “signs”

Policy VLS-9: 13) Add to end of sentence "...except required for proper transition to new street profile"

#### Valley Freeway Interchange Program Policies

Policy VFI-2: Third sentence – Replace "the intent of Policy VFI-2 can be achieved" with "the following intents can be achieved".

Policy VFI-7: Replace "contractor" with "contractor/consultant" in two places.

Policy VFI-11: Replace "private share" with "private (development) share". Also, comment only: involve local agency in updating interchange construction cost estimates

Policy VFI-12: Replace "fair share collection" with "development fair share collection".

Allow adding new freeway interchange projects to the Nexus Study project list if the sponsoring agency provides a comparable reduction in the public share by eliminating other interchange or arterial projects.

Policy VFI-13: The policy indicates that initiation of an interchange project by SANBAG to facilitate delivery of a freeway project does not waive any requirements for local jurisdictions to provide the development share of the interchange project cost. However, since the interchange project referred to in this policy is not initiated by a local jurisdiction, and the local jurisdiction may not be prepared to provide the required matching development share for the SANBAG-initiated project, this policy should include language as to "when" the local jurisdiction is required to provide the matching development share. There should be more discussion on this topic.

Policy VFI-14: Change reference to funding allocation from Policy VFI-13 to Policy VFI-2.

Policy VFI-17: The Project Funding Agreement for one phase of a project should only require the local jurisdiction to commit to providing the development share for the same phase but not for all phases of the project.

Policy VFI-23: Clarify that the project for which a local jurisdiction requests loans from SANBAG for development share should be a project ready for allocation of Measure I funds by the SANBAG Board pursuant to project priority referred to in Policy VFI-2. Also clarify whether the loans from SANBAG will come out of the same Valley Freeway Interchange Program.

Project VFI-24, 25 and 26: Replace "credit agreement" with "credit agreement/arrangement".

Policy VFI-29: Delete the entire second bullet point. Doesn't SANBAG use consultants to oversee freeway interchange and other major projects? Project oversight costs should be eligible for reimbursement from the Valley Freeway Interchange Program.

Policy VFI-30: This policy indicates that local jurisdiction is fully responsible for all construction cost overruns in excess of the construction bid amount and reasonable contingencies. This is not a logical requirement and will put an undue burden on the local jurisdiction. Will SANBAG be fully responsible for all construction cost overruns if the interchange project is initiated by SANBAG in conjunction with a freeway project? As long as the scope of the interchange project is included in the Project Funding Agreement, the final construction cost, including any cost overrun, should be shared between SANBAG and the local jurisdiction pursuant to the Agreement.

#### Valley Major Street Program

Policy VMS-25: Second bullet point – editing comment “...to manage the project and the request is ...”

Policy VMS-30: Change “Table 1” to “Table IV-4 in Part 1 of Strategic Plan”.

Policy VMS-33: It would be helpful to provide an example in Part 1 to illustrate how the time-value of money adjustment is made.

VMS-40: Amend second sentence to indicate that the documentation will be regularly provide to local jurisdictions as it is reported to appropriate policy and technical committees, and on a request basis if the local jurisdiction requests the information prior to the scheduled timeline of the regular reporting period.

Policy VMS-44: Replace “contractor” with “contractor/consultant” in two places.

Policy VMS- 48: Delete the second bullet point. All project-related costs should be eligible for reimbursement from the Arterial Sub-program up to the amount available for reimbursement pursuant to other program policies.

Policy VMS-51: Change second sentence to read “The internal accounts shall be reimbursed by the development mitigation account as development occurs”.

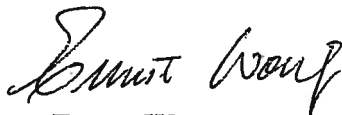
Policy VMS- 54, 55 and 56: Replace “credit agreement” with “credit agreement/arrangement”.

Other Comments:

1. Include a separate policy to address the calculation of public and private share if a freeway interchange or an arterial project is partly funded by federal or state grants, or any other grant monies secured by the local jurisdiction.
2. Include a separate policy to address the situation where a local jurisdiction is ready to incur cost on a project under the freeway interchange, major street or local street programs prior to SANBAG Board's approval of the Strategic Plan, which contains the Advance Expenditure policies. This separate policy will enable the local jurisdiction to receive reimbursement of the public share for its eligible project expenses incurred before the Advance Expenditure process become effective.

Please contact me if there are any questions regarding this comment letter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ernest Wong".

Ernest Wong  
Public Works Director/City Engineer

cc: Joseph Hughes, City Manager